

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

PENNSYLVANIA NATIONAL MUTUAL
CASUALTY INSURANCE COMPANY

Plaintiff,

vs.

PARKSHORE DEVELOPMENT
CORPORATION

and

CATALINA COVE CONDOMINIUM
ASSOCIATION, INC.

and

KEEN'S CAULKING AND
WATERPROOFING

and

ABC CORPORATION I through ABC
CORPORATION X, fictitious names,

Defendants.

NOTICE OF MOTION FOR MOTION FOR SUMMARY JUDGMENT

To: Salvatore Perillo, Esquire
Perskie Nehmad & Perillo
P.O. Box 730
Somers Point, NJ 08244

PLEASE TAKE NOTICE that Plaintiff Pennsylvania National Mutual Casualty Insurance Company ("PNI") moves pursuant to Fed. R. Civ. P. 56(b) for summary judgment granting declaratory relief in its favor and against defendants.

In support of the within Motion, Penn National relies upon the supporting Memorandum of Law submitted herewith. A proposed form of Order is also submitted.

Respectfully submitted,

WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY LLP

Dated: January 31, 2008

BY: s/ Michael S. Savett

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